

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re

Chapter 13

Angella Brown

CASE # 13-22425-rdd

Debtor

X

Angella Brown

Plaintiff

Adv. Case No.: 13-08308-rdd

-against-

Bank of America, N.A.,

Defendant.

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STIPULATION AND ORDER

WHEREAS, on or about October 25, 2007, Angella Brown (the “Debtor”) executed a note and security deed to Ryland Mortgage Company in the principal amount of Two Hundred Seventy-Nine Thousand Seven Hundred Seventy-Five Dollars and Zero Cents (\$279,775.00) pledging the real property known as 1312 Darian Lane, Locust Grove, Georgia 30248 (the “Premises”);

WHEREAS, on or about March 14, 2013, the above captioned debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code;

WHEREAS, the Debtor filed an Adversary Complaint to determine the status of Claimant’s claim as unsecured pursuant to 11 U.S.C. Sections 506(a).

NOW THEREFORE, in consideration of the Premises stated herein,

IT IS HEREBY STIPULATED, CONSENTED AND AGREED TO, by and between the attorneys for the undersigned parties, as follows:

1. The Defendant Bank of America, N.A.'s time to answer the Complaint is hereby extended to and including July 22, 2013.
2. This Stipulation may be signed in counterparts and the counterparts, taken together shall be deemed a fully executed and binding stipulation and a fax copy shall be treated as an original; and
3. The parties hereto submit to the jurisdiction of the Bankruptcy Court with respect to all matters relating or pertaining to this Stipulation and its enforcement.

Dated:

June 19, 2013
New York, New York

_____/S/
Law Offices of Irina Lust, PLLC
By: Irina Lust, Esq.
Attorneys for Debtor
75 Maiden Lane, Suite 506
New York, New York 10013

Dated:

June 19, 2013
Plainview, New York

_____/S/
Rosicki, Rosicki & Associates PC
By: Eric S. Sheidlower, Esq.
Attorneys for Defendant Bank of America, N.A.
51 E. Bethpage Road
Plainview, NY 11803

It is SO ORDERED this 19th day of June, 2013

/s/Robert D. Drain

Honorable Robert D. Drain

United States Bankruptcy Judge